

Sacco & Fillas LLP

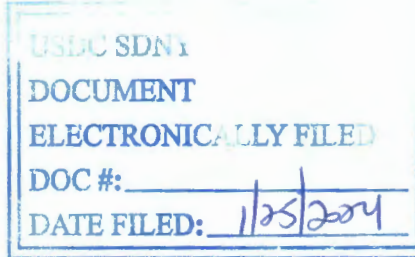
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January 24, 2024

VIA ECF

JUDGE COLLEEN MCMAHON
United States District Court
Southern District of New York
500 Pearl Street, Room 24A
New York, New York 10007



Re: *Garcia v. Three Decker Restaurant LTD (d/b/a 3 Decker Restaurant) et al*
CASE #: 1:22-cv-01387-CM

Your Honor,

MEMO ENDORSED

This office represents Plaintiff. We respectfully submit this joint letter to respectfully request an extension of time to submit the Joint Pretrial Order.

The current deadline to submit the JPTO and connected documents (voir dire, jury instructions etc.) is January 26, 2024. The parties respectfully request the Court's approval to extend the submission deadline to February 9, 2024.

The reason for this request is to ensure a comprehensive submission that has been properly reviewed by all parties. Additionally, currently the summary judgment motion is still pending. Potential changes to the JPTO may be required based on the court's decision on the summary judgment motion.

The extension does not appear to affect scheduled dates because the parties have not received notice of a trial date and summary judgment is outstanding. All parties consent to this extension. This is the sixth letter motion to extend the time to submit the JPTO. ECF No. 144.

We thank the Court for the time and attention to this matter.

Signed,

By: /s/ Clifford Tucker
Clifford Tucker, Esq.

1/25/2024
We are starting
work on the motions -
hold off on the PTO
until we are done